

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Joshua Winer,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE
v.)	NO. 1:25-CV-02329-TWT
)	
Umaymah Mohammad, AJP Educational)	
Foundation, Inc. A/K/A American Muslims)	
For Palestine, WESPAC Foundation, Inc.,)	
Sean Eren as the representative of National)	
Students for Justice in Palestine, Doctors)	
Against Genocide Society, Cair-Nga Inc.)	
A/K/A CAIR-Georgia, CAIR Foundation)	
Inc., A/K/A Council on Islamic Relations or)	
CAIR, Rupa Marya, Ibrahim Jouja as)	
representative of Emory Students for Justice)	
in Palestine,)	
)	
Defendants.)	

**STIPULATION OF DEADLINE FOR DEFENDANT CAIR-FOUNDATION,
INC. TO FILE A RESPONSIVE PLEADING TO PLAINTIFF’S AMENDED
COMPLAINT**

COME NOW, Joshua Winer (“Plaintiff”) and CAIR-Foundation, Inc. (“CAIR-Foundation”) (collectively, “Parties”), Parties to the above-styled civil action and, by and through their respective undersigned counsel, hereby show this honorable Court as follows:

1.

Plaintiff filed his Complaint on April 25, 2025. [Doc. 1.]

2.

Plaintiff filed his Amended Complaint on May 20, 2025. [Doc. 22.]

3.

CAIR-Foundation was served with the Amended Complaint on June 17, 2025. [Doc. 46.] Its Answer or other responsive pleading is thus due on July 8, 2025.

4.

Undersigned defense counsel was retained to represent CAIR-Foundation on June 23, 2025. Due to the nature of the allegations and defense counsel's recent involvement, CAIR-Foundation needs additional time to review the Amended Complaint and prepare a response.

5.

Thus, the Parties stipulate and agree that CAIR-Foundation, Inc. shall have through and including July 22, 2025 to answer, object, or otherwise respond to Plaintiff's Amended Complaint.

6.

Should CAIR-Foundation respond by filing a Motion to Dismiss instead of an Answer, the Parties further stipulate and agree that Plaintiff shall have thirty (30) days from the filing of CAIR-Foundation's Motion to Dismiss to file a response to CAIR-Foundation's Motion to Dismiss.

RESPECTFULLY SUBMITTED AND CONSENTED TO BY:

**SWIFT, CURRIE, MCGHEE &
HIERS**

/s/ David F. Katz (by express
permission to Kori E. Wagner)

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LOCAL RULE 5.1(C) CERTIFICATION

By signature below, counsel certifies that the foregoing pleading was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1(C).

SWIFT, CURRIE, McGHEE & HIERS

By: /s/Kori E. Wagner

Kori E. Wagner

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **STIPULATION OF DEADLINE FOR DEFENDANT CAIR-FOUNDATION, INC. TO FILE A RESPONSIVE PLEADING TO PLAINTIFF'S AMENDED COMPLAINT** with the Clerk of Court using the CM/ECF System which will notify counsel of record as follows:

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I further certify that I have this day served the foregoing **STIPULATION OF DEADLINE FOR DEFENDANT CAIR-FOUNDATION, INC. TO FILE A**

RESPONSIVE PLEADING TO PLAINTIFF'S AMENDED COMPLAINT via

U.S. Mail upon the following parties:

Defendant Umaymah Mohammed
c/o Jonathan Wallace
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Amagansett, NY 11930

Defendant Rupa Marya
c/o Jonathan Wallace
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Defendant AJP Educational
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Defendant Sean Eren as Representative
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Defendant Ibrahim Jouja as
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6301 Glen Hill Road
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Defendant Doctors Against Genocide
Society
c/o Registered Agent Nidal Jboor
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Dearborn Heights, MI 48127

Defendant WESPAC Foundation, Inc.
77 Tarrytown Road, Suite 2W
White Plains, NY 10607

This 3rd day of July, 2025.

SWIFT, CURRIE, McGHEE & HIERS

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